

STRAFFI & STRAFFI, LLC

670 Commons Way

Toms River, NJ 08755

(732) 341-3800

(732) 341-3548 (fax)

bkclient@straffilaw.com

Attorney for Debtor-in-Possession

In Re:) UNITED STATES BANKRUPTCY COURT
) FOR THE DISTRICT OF NEW JERSEY
)
) Chapter 11 Proceeding
) Case No. 18-193967/VFP
Jones, Kimberly)
) NOTICE OF MOTION FOR ENTRY OF
) AN ORDER VOLUNTARILY DISMISSING
Debtor(s).) CHAPTER 11 PROCEEDINGS;
)
) Hearing Date: June 25, 2019 @ 10:00 am
)
) ORAL ARGUMENT WAIVED

To: All parties on mailing list annexed.

PLEASE TAKE NOTICE that Daniel E. Straffi, Jr., attorney for Kimberly Jones shall move before the Honorable Vincent F. Papalia, United States Bankruptcy Court, 50 Walnut Street, Newark, New Jersey, Courtroom 3B on June 25, 2019 @ 10:00 a.m. or as soon as possible thereafter as counsel may be heard, for the entry of an Order Dismissing the Chapter 11 Proceedings.

PLEASE TAKE FURTHER NOTICE that the movant shall rely upon the attached Certification. No brief is submitted since no unique questions of law exists; and

PLEASE TAKE FURTHER NOTICE that the undersigned waives oral argument and consents to a disposition on the papers; and

PLEASE TAKE FURTHER NOTICE that if any party objects to this motion, a written objection must be filed with the Clerk of the United States Bankruptcy Court, 50 Walnut

Street, Newark, New Jersey 07102, with a copy served upon the undersigned Trustee. All such objections must be filed not later than seven (7) days before the above hearing date or such other time as the Court may direct; and

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is enclosed.

/s/ Daniel E. Straffi, Jr.

Dated: June 1, 2019

Daniel E. Straffi, Jr.

US Trustee's Office
One Newark Center
Suite 2100
Newark, NJ 07102
Attn: Michael Artis, Esq.

Kimberly Jones
c/o DDK & Company, LLP
1 Penn Plaza, 4th Floor
New York, NY 10119
(Debtor)

SN Servicing Corporation
323 Fifth Street
Eureka, CA 95501
Attn: Officer, Managing or General Agent
(Secured Creditor)

Friedman Vartolo, LLP
85 Broad Street
Suite 501
New York, NY 10004
Attn: Jonathan Schwalb, Esq.
(Attorney for SN Servicing Corporation)

Internal Revenue Service
Centralized Insolvency Operations
PO Box 7346
Philadelphia, PA 19101-7346
(Notice Only)

United States Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001
Attn: William Barr, Attorney General
(Notice Only)

United States of America
Office of the US Attorney
District of New Jersey
402 E. State Street
Room 430
Trenton, NJ 08608-1507
Attn: Craig Carpenito, US Attorney
(Notice Only)

Internal Revenue Service
Special Procedures Branch
Bankruptcy Section
PO Box 7346
Philadelphia, PA 19101-7346
(Creditor)

State of New Jersey
Office of the Attorney General
Hughes Justice Complex
25 Market Street
PO Box 112
Trenton, NJ 08625-0080
Attn: Gurbir Grewal, Acting Attorney General
(Notice Only)

State of New Jersey
Division of Taxation
PO Box 642
Trenton, NJ 08645-0642
(Creditor)

State of New Jersey
Department of Treasury
Division of Taxation, Judgment Sec.
PO Box 245
Trenton, NJ 08695-0445
(Creditor)

NJSVS, Surcharge Violations System Office
NJSVS, Bankruptcy Unit
PO Box 136
Trenton, NJ 08666
(Creditor)

Candlewood North
9830 Reseda Blvd.
Northridge, CA 91324-2060
(Creditor)

FCO
12304 Baltimore Avenue
Beltsville, MD 20705-1314
(Notice Only)

Cedars Car Service, LLC
149 N. Finley Avenue
Basking Ridge, NJ 07920-1631
(Creditor)

Hackensack University Medical Center
30 Prospect Avenue
Hackensack, NJ 07601-1915
(Creditor)

Celentano, Stadtmauer & Walentowicz, LLP
1035 Route 46 East
PO Box 2594
Notchview Office Park
Clifton, NJ 07015-2594
(Attorney for Hackensack University Medical Center)

Dewey & LeBoeuf
1301 Avenue of Americas
New York, NY 10019-6022
(Creditor)

North Jersey Orthopedics
730 Palisade Avenue
Teaneck, NJ 07666-3144
(Creditor)

GEM Recovery Systems
1001 McBride Avenue
Little Falls, NJ 07424-2534
(Notice Only)

Wisdom Financial
277 Northern Blvd., Suite 10
Great Neck, NY 11021-4705
(Creditor)

Pinnacle Credit Services, LLC
Resurgent Capital Services
PO Box 10587
Greenville, SC 29603-0587
(Creditor)

New Jersey Healthcare Specialists, PC
30 Prospect Avenue
Hackensack, NJ 07601-1915
(Creditor)

Pressler, Felt & Warshaw, LLP
7 Entin Road
Parsippany, NJ 07054
(Attorney for New Jersey Healthcare Specialists, PC)

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Attorney for Debtor-in-Possession

In Re:) UNITED STATES BANKRUPTCY COURT
) FOR THE DISTRICT OF NEW JERSEY
)
) Chapter 11 Proceeding
) Case No. 18-32075/VFP
Jones, Kimberly)
) CERTIFICATION OF DEBTOR IN
) SUPPORT OF NOTICE OF MOTION FOR
) ENTRY OF AN ORDER VOLUNTARILY
) DISMISSING CHAPTER 11 PROCEEDINGS
Debtor.)
) Hearing Date: June 25, 2019 @ 10:00 am
) ORAL ARGUMENT WAIVED

Kimberly Jones, being of full age, certifies as follows:

1. I am the Debtor in the above action and am personally familiar with the matters sets forth below.
2. I make this certification in support of the motion for entry of an order dismissing the Chapter 11 proceeding.
3. The within petition was filed on May 8, 2018 for relief under Chapter 13 to stop an impending sheriff sale of my property located at 39 Timberline Drive, Alpine, New Jersey.
4. I was unable to acquire a loan modification during the pendency of the Chapter 13 proceeding and, due to debt limitations, converted to Chapter 11 on August 9, 2018.
5. The appointment of my attorney, Daniel E. Straffi, Jr. was entered on October 15, 2018.

6. Since the conversion date, I have remained in possession of its assets and continue the management of the bankruptcy estate as a debtor-in-possession pursuant to §1107 and §1108 of the Bankruptcy Code. No request has been made for the appointment of a trustee or an examiner in this case, and no official committee has yet been appointed by the Office of the United States Trustee.

7. All administrative fees and monthly operating reports are current.

8. This case was filed to stay a foreclosure action with the purpose to allow me time to obtain a loan modification.

9. Thankfully, through the efforts of counsel and my continued adequate protection payments pursuant to the Order of this Court, I am now in a loan modification trial period with SN Servicing Corporation. A copy of the Modification Trial Period Plan is annexed hereto as Exhibit "A".

10. Accordingly, I no longer desire or need the relief provided by Chapter 11 of the Bankruptcy Code and hereby request that my case be dismissed in accordance with the provisions of §1112.

11. I certify that all of the above statements made by me are true. I am aware that if any of the above statements made by me are willfully false, I am subject to punishment.

Dated: May 30, 2019

/s/ Kimberly Jones

Kimberly Jones